

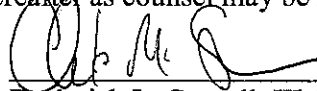
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                      |   |                       |
|--------------------------------------|---|-----------------------|
| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Plaintiff,                           | ) |                       |
|                                      | ) | C.A. No. 06-00593-JJF |
|                                      | ) |                       |
| v.                                   | ) |                       |
|                                      | ) |                       |
| CIBA SPECIALTY CHEMICALS             | ) |                       |
| CORPORATION, a Delaware Corporation, | ) |                       |
|                                      | ) |                       |
| Defendant.                           | ) |                       |
| _____                                | ) |                       |
| <br>                                 |   |                       |
| CIBA SPECIALTY CHEMICALS             | ) |                       |
| CORPORATION, a Delaware Corporation, | ) |                       |
|                                      | ) |                       |
| Plaintiff,                           | ) |                       |
|                                      | ) | C.A. No. 06-672-JJF   |
| v.                                   | ) |                       |
|                                      | ) |                       |
| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Defendant.                           | ) |                       |
| _____                                | ) |                       |
| <br>                                 |   |                       |
| CIBA SPECIALTY CHEMICALS             | ) |                       |
| CORPORATION, a Delaware Corporation, | ) |                       |
|                                      | ) |                       |
| Cross-Plaintiff,                     | ) |                       |
|                                      | ) | C.A. No. 06-00629-JJF |
| v.                                   | ) |                       |
|                                      | ) |                       |
| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Cross-Defendant.                     | ) |                       |
|                                      | ) |                       |

**NOTICE OF CIBA'S MOTION FOR LEAVE OF  
COURT TO SERVE LIMITED DISCOVERY RELATING TO  
3V'S DISCLAIMER OF ITS PATENT CLAIMS**

|   |                            |
|---|----------------------------|
| To: Joseph Grey                                 | Angelica M. Colwell        |
| Stevens & Lee                                   | Nexsen Pruet, LLC          |
| 1105 North Market Street, 7 <sup>th</sup> Floor | 205 King Street, Suite 400 |
| Wilmington, DE 19801                            | Charleston, SC 29401       |

PLEASE TAKE NOTICE THAT CIBA Specialty Chemicals Corporation's Motion Seeking Leave of Court to Serve Limited Discovery Relating to 3V's Discovery of its Patent Claims, dated April 15, 2008, shall be presented to the Court on June 6, 2008 at 10:00 a.m., or as soon thereafter as counsel may be heard.



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*Counsel for CIBA Specialty Chemicals Corporation*

*Of Counsel:*

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Brion Heaney

Richard J. Traverso

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(703) 312-5305

Dated: April 16, 2008

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                      |   |                       |
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| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Plaintiff,                           | ) |                       |
|                                      | ) | C.A. No. 06-00593-JJF |
|                                      | ) |                       |
| v.                                   | ) |                       |
|                                      | ) |                       |
| CIBA SPECIALTY CHEMICALS             | ) |                       |
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|                                      | ) |                       |
| Defendant.                           | ) |                       |
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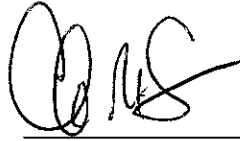
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| 3V, INC., a Delaware Corporation,    | ) |                       |
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| Defendant.                           | ) |                       |
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| CORPORATION, a Delaware Corporation, | ) |                       |
|                                      | ) |                       |
| Cross-Plaintiff,                     | ) |                       |
|                                      | ) | C.A. No. 06-00629-JJF |
|                                      | ) |                       |
| v.                                   | ) |                       |
|                                      | ) |                       |
| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Cross-Defendant.                     | ) |                       |
|                                      | ) |                       |

**CIBA’S MOTION FOR LEAVE OF COURT TO SERVE LIMITED DISCOVERY  
RELATING TO 3V’S DISCLAIMER OF ITS PATENT CLAIMS**

CIBA Specialty Chemicals Corporation (“CIBA”) hereby moves for leave of Court to serve limited discovery on 3V, Inc. (“3V”) relating to 3V’s disclaimer of its patent claims.

The grounds for this Motion are fully set forth in the CIBA's opening brief, which is being filed contemporaneously with this Motion.



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(302) 651-7700  
*Counsel for CIBA Specialty Chemicals  
Corporation*

Dated: April 16, 2008

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                      |   |                       |
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| 3V, INC., a Delaware Corporation,    | ) |                       |
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| Plaintiff,                           | ) |                       |
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| v.                                   | ) |                       |
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| 3V, INC., a Delaware Corporation,    | ) |                       |
|                                      | ) |                       |
| Cross-Defendant.                     | ) |                       |
|                                      | ) |                       |

**CERTIFICATION PURSUANT TO DISTRICT COURT  
OF DELAWARE LOCAL RULE 7.1.1.**

Pursuant to Local Rule 7.1.1., the undersigned counsel for CIBA Specialty Chemicals Corporation certifies that 3V, Inc. opposes the relief sought by this Motion.



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*Counsel for CIBA Specialty Chemicals  
Corporation*

*Of Counsel:*

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Richard J. Traverso

Millen White Zelano & Branigan, P.C.

2200 Clarendon Boulevard

Suite 1400

Arlington, VA 22201

(703) 312-5305

Dated: April 16, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2008, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

**BY HAND**

Joseph Grey  
Stevens & Lee  
1105 North Market Street  
7<sup>th</sup> Floor  
Wilmington, DE 19801

I hereby certify that on April 16, 2008, I sent the foregoing document by Federal Express, to the following non-registered participants:

Angelica M. Colwell  
Nexsen Pruet, LLC  
205 King Street, Suite 400  
Charleston, SC 29401

Sara Centioni Kanos  
201 W. McBee Avenue, Suite 400  
Greenville, SC 29601

A handwritten signature in black ink, consisting of a stylized 'C' followed by a horizontal line.

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Chad M. Shandler (#3796)  
shander@rlf.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                      |   |                       |
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|                                      | ) |                       |
| Cross-Defendant.                     | ) |                       |
|                                      | ) |                       |

**ORDER**

THE COURT, having considered CIBA Specialty Chemicals Corporation's Motion For Leave of Court to Serve Limited Discovery Relating to 3V's Disclaimer of its Patent Claims, and the parties' positions related thereto,



**IT IS HEREBY ORDERED** this \_\_\_\_ day of June 2008 that the Motion is GRANTED and that:

A. 3V, Inc. shall be required to respond to the discovery attached to CIBA's opening brief in support of the Motion;

B. 3V shall have ten (10) days to respond to such discovery; and

C. CIBA shall be permitted to take a 30(b)(6) deposition of 3V, Inc. relating to 3V's decision to disclaim its claims on the patents at issue; said deposition to occur within thirty (30) days of this Order.

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United States District Court Judge